

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

ROBERT DEDMON,

*Plaintiff,*

v.

SHELL EXPLORATION & PRODUCTION  
COMPANY AND SHELL TRADING  
SERVICES COMPANY,

*Defendants*

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CIVIL ACTION NO.

4:21-CV-03371

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFF'S EXHIBIT LIST**

Defendants Shell Exploration & Production Company and Shell Trading Services Company ("Defendants" or "Shell"), in response to Plaintiff's Exhibit List (Dkt. No. 53), state the following:

In addition to the specific objections listed below (which are designated by topics as Plaintiff did not include any preliminary exhibit numbers or other markers at this stage), Defendants object to Plaintiff's use of descriptors, headings or other explanatory information or language in his Exhibit List. Such information is irrelevant, argumentative, and unfairly prejudicial. FRE 401-403.

**Frnka LinkedIn Documents:** Defendants object to this exhibit because it is irrelevant, lacks proper foundation and/or authentication and contains inadmissible hearsay. FRE 401-403, 801-803.

**Olmen LinkedIn Documents:** Defendants object to this exhibit because it is irrelevant, lacks proper foundation and/or authentication and contains inadmissible hearsay. FRE 401-403, 801-803.

**EEOC Records:** Defendants object to this exhibit because it irrelevant, unfairly prejudicial, has the potential to confuse the jury, and contains inadmissible hearsay. FRE 401-403; 801-803. Defendants also object that this exhibit is nothing more than unsupported allegations and conclusions that mirror Plaintiff's Complaint, which is not evidence. The probative value, if any, of the EEOC records is greatly outweighed by its unfair prejudice.

**Text messages between Plaintiff and Sri Rangan:** Defendants object to this exhibit because it contains inadmissible hearsay and information that is irrelevant and unfairly prejudicial. FRE 401-403, 801-803.

**Policies that pre-date Plaintiff's employment:** Defendants object to these exhibits because they are irrelevant and lack proper foundation. FRE 401-403.

**2016 Barnes Helpline Complaint:** Defendants object to this exhibit because it is irrelevant, lacks probative value, lacks proper foundation, and is unfairly prejudicial. FRE 401-403.

**Articles, press releases, magazine profiles, and media reports (1996, 2006, 2012):** Defendants object to these exhibits because they are irrelevant, unfairly prejudicial, contain hearsay, are not authenticated, lack probative value, and lack proper foundation. FRE 401-403; 801-803.

**Pleadings and documents from other cases (Rodriguez, Shater, Shur, Sheik):** Defendants object to these exhibits because they are irrelevant, unfairly prejudicial, contain hearsay, are not authenticated, lack probative value, and lack proper foundation. FRE 401-403; 801-803.

**UK Reports:** Defendants object to these exhibits because they are irrelevant, unfairly prejudicial, lack probative value, and lack proper foundation. FRE 401-403.

**EEO Reports:** Defendants object to these exhibits because they are irrelevant, unfairly prejudicial, lack probative value, and lack proper foundation. FRE 401-403.

**Pay Summary:** Defendants object to these exhibits because they are irrelevant, unfairly prejudicial, incomplete, duplicative and/or cumulative of other testimony, unauthenticated and lack proper foundation. FRE 401-403; 901.

**Expert Records:** Defendants object to these exhibits because they are irrelevant, not reliable, unfairly prejudicial, contain hearsay and unsupported and/or impermissible assertions (including regarding causation), and lack proper foundation. FRE 104; 401-403; 702; 801-803; *Edmonds v. Illinois Cent. Gulf R. Co.*, 910 F.2d 1284, 1286-88 (5th Cir. 1990); *see Shu-Hui Wu v. Mississippi State Univ.*, 626 Fed. Appx. 535, 540 (5th Cir. 2015); *see also Viterbo v. Dow Chem. Co.*, 826 F.2d 420, 424 (5th Cir. 1987); *Chavez v. Home Depot*, 2023 WL 6119881, \*\*2-5 (S.D. Tex., Sept. 18, 2023).

**Calendars:** Defendants object to these exhibits because they are irrelevant, contain hearsay, are not authenticated, and lack proper foundation. FRE 401-403; 801-803.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

/s/ Marlene C. Williams

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**ATTORNEYS FOR DEFENDANT  
SHELL OIL COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2025 a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will provide notification of this filing to all known attorneys of record.

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